IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

BABY DOE, et al.,)
Plaintiffs,)
v.) Case No. 3:22-cv-49-NKM
JOSHUA MAST, et al.,)
Defendants,)
))

DEFENDANTS JOSHUA AND STEPHANIE MAST'S MOTION TO SEAL THEIR ANSWER TO THE AMENDED COMPLAINT; AFFIRMATIVE & OTHER DEFENSES; & COUNTERCLAIM COMPLAINT

Defendants Joshua and Stephanie Mast (the "Masts"), by and through their undersigned counsel, hereby move the Court to seal their Answer to the Amended Complaint; Affirmative & Other Defenses; & Counterclaim Complaint (ECF No. 467). In support of their motion, the Masts state as follows:

- 1. The Masts' Answer contains discussion of and reference to information that is subject at least potentially subject to the Court's protective order in this case (ECF No. 26).
- 2. While the Masts have objected to that protective order and asked that it be lifted, they seek to file this document under seal with limited redactions to avoid any suggestion that they might identify Plaintiffs or their relatives.
- 3. The Masts believe sealing is the best way to comply with the Court's protective order.

For the above reasons, the Masts respectfully request the Court grant this Motion to Seal Their Answer to the Amended Complaint.

Dated: August 7, 2024 Respectfully submitted,

/s/ John S. Moran
John S. Moran (VSB No. 84326)
MCGUIREWOODS LLP
888 16th St. N.W., Suite 500
Black Lives Matter Plaza
Washington, DC 20006
T: (202) 828-2817
F: (202) 828-3327

jmoran@mcguirewoods.com

Counsel for Defendants Joshua and Stephanie Mast